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CC FORD GROUP WEST, LLC,	:	
	:	UNITED STATES DISTRICT COURT
Plaintiff,	:	DISTRICT OF NEW JERSEY
	:	
v.	:	Civil Action No. 22-4143 (MAS)
	:	
JENNIFER JOHNSON, et al.,	:	SCHEDULING ORDER
	:	
Defendants.	:	

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THIS MATTER having come before the Court for an initial scheduling conference on January 20, 2023; and good cause appearing for the entry of this Order:

IT IS on this 23rd day of January , 2023

ORDERED THAT:

**I. PLEADINGS AND DISCLOSURES**

1. Without objection, this action is hereby consolidated with the matter of *Johnson v Studdiford*, Civil Action no. 22-7470 (MAS/DEA).
2. Plaintiff's motion to dismiss the counterclaim [ECF no. 33] is fully briefed and remains pending.
3. Any motion for leave to amend the pleadings or add parties must be timely made and in any event within 60 days of receipt of responses to the parties' initial written discovery requests.
4. The initial disclosures required by Fed.R.Civ.P. 26 must be served **by February 3, 2023.**
5. The E-discovery conference required by L.Civ.R. 26.1 (d) must be conducted **by February 10, 2023.**

**II. DISCOVERY CONFIDENTIALITY ORDERS**

6. Any proposed confidentiality order agreed to by the parties must comply with Fed.R.Civ.P. 26(c) and L.Civ.R. 5.3. Any such Order must be submitted to the Court **by November 23, 2022** and must be clearly designated **"Discovery Confidentiality Order"**.

### **III. DISCOVERY AND MOTIONS**

7. Discovery shall proceed in the manner set forth in the parties' Joint Discovery Plan. Fact discovery must be completed **by September 29, 2023**.
8. All parties must conduct discovery expeditiously and diligently. In addition, all discovery conducted must be proportional to the needs of the case considering the factors set forth in Fed. R. Civ. P. 26(b)(1).
9. The parties must meet and confer in a good faith effort to resolve any discovery or case management dispute before bringing such dispute to the attention of the Court. *See* L.Civ.R. 16.1(f)(1). Any unresolved disputes must be brought to the Court's attention promptly by a joint letter to the undersigned.
10. No discovery motion or motion for sanctions for failure to provide discovery shall be made without prior leave of Court.

### **IV. EXPERT DISCOVERY**

11. Any affirmative expert disclosures and reports (liability and damages) must be served by October 30, 2023.
12. Any responsive expert disclosures and reports must be served by November 30, 2023.

### **V. FUTURE CONFERENCES**

13. The Court will conduct a telephone status conference **on April 3, 2023 at 10:30am**. Plaintiffs' counsel must initiate the call to 609-989-2144.
14. The parties must confer at least 48 hours in advance of each Court appearance to confirm attendance and to review any matters to be discussed with the Court.

s/ Douglas E. Arpert  
**DOUGLAS E. ARPert**  
**United States Magistrate Judge**